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Director

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OPP02-0049

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Public Information and Records Integrity Branch
Office of Pesticide Programs (OPP)
U.S. Environmental Protection Agency (7502C)
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460-0001

Dear Sirs:

We appreciate the opportunity to provide comments to the January 29, 2003 Federal Register announcement of "Rodenticides: Availability of Preliminary Comparative Ecological Assessment," Docket Number OPP-2002-0049.

The California Department of Pesticide Regulation (DPR), along with the California Department of Fish and Game's Pesticide Investigations Unit (PIU), have examined the deleterious effects of brodifacoum on nontarget wildlife for many years and believe additional restrictions should be imposed on its use. Although brodifacoum is only registered for home use, it is the most common rodenticide found in wildlife losses, and the PIU has requested DPR for a formal reevaluation of this rodenticide.

The large number of incidents of nontarget wildlife due to brodifacoum (not only in California, but also New York and Canada) appear to be unique when compared to other rodenticides. Brodifacoum's lengthy retention time in target animals, as referenced in studies conducted in New Zealand, may contribute to the number of incidents with which it is associated.

In the "Overview of the Rodenticide Comparative Ecological Assessment" document (page 5, last sentence), brodifacoum, zinc phosphide, and difethialone are considered "posing the greatest potential overall risk to nontarget birds and mammals." DPR thoroughly agrees with this comment and wishes to note that actual field incidents in California with zinc phosphide and difethialone are minimal when compared to brodifacoum. Although not ranked in the top three summary values, bromadiolone appears to be the second most common rodenticide involved in nontarget wildlife incidents in California. (PIU data 1994 – 2000).

The review document, Table 1, page six, shows the highest summary value (5.55) for the anticoagulant brodifacoum which is considerably higher than for zinc phosphide, an acute rodenticide used both indoors and outdoors. Difethialone (even with the low 25 ppm bait a.i.) is the third most toxic as a primary risk to birds, second most toxic as a secondary risk to birds, and third most toxic as a summary value.

California's incident data for diphacinone and chlorophacinone combined (21 out of 105 animals) falls short of brodifacoum (68 out of 105 animals) even though both the former materials are registered and used outdoors against rangeland and agricultural rodent pests. Fairly recently, both the United Kingdom and New Zealand have placed additional restrictions on the use of brodifacoum for both field and homeowner use.

In summary, DPR agrees with the conclusions of the overview document. Additionally, based on the conclusions of the overview document and the California PIU incident summary, DPR recommends that the U.S. Environmental Protection Agency classify all brodifacoum (and possibly difethialone) products as a "restricted material". Most currently registered zinc phosphide products are already classified as restricted materials.

Should you have further questions on our comments, please contact Mr. Jon Shelgren, of DPR's Pesticide Registration Branch, at (916) 324-3952.

Sincerely,

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Division of Registration and Health Evaluation
(916) 445-3984

cc: Mr. Jon Shelgren